

Our Ref: 105181-024

18 May 2026

Canterbury City Council  
[consultations@canterbury.gov.uk](mailto:consultations@canterbury.gov.uk)  
 via email only

Fisher German LLP  
 The Estates Office  
 Norman Court  
 Ashby de la Zouch  
 LE65 2UZ

t. 01530 412821  
 fishergerman.co.uk

Dear Sir /Madam,

## Canterbury Local Plan Regulation 19 Consultation 23 March 2026 – 18 May 2026 Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

### About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

### Proposed development sites crossed or in close proximity to NGET assets

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed by or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.

| Development Plan Document Site / Designation / Policy | Asset Description                                                  |
|-------------------------------------------------------|--------------------------------------------------------------------|
| Policy DS22 – Habitats, landscapes and sites of local | National Grid Electricity Transmission Plc – Freehold - Canterbury |

|                                                                             |                                                                                                                                          |
|-----------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| importance (Great Stour, Ashford to Fordwich Local Wildlife Site)           |                                                                                                                                          |
| Policy C15 – Land south of Littlebourne Road                                | ZY ROUTE TWR (001A - 001 - 078): 400kV Overhead Transmission Line route: CANTERBURY NORTH - SELLINDGE 1 - CANTERBURY NORTH - SELLINDGE 2 |
| Policy C16 – Land south of Bekesbourne Lane                                 | ZY ROUTE TWR (001A - 001 - 078): 400kV Overhead Transmission Line route: CANTERBURY NORTH - SELLINDGE 1 - CANTERBURY NORTH - SELLINDGE 2 |
| Policy C31 – Land on the eastern side of Shelford Landfill                  | ZV ROUTE TWR (166 - 208): 400kV Overhead Transmission Line route: CANTERBURY NORTH - KEMSLEY 1 - CANTERBURY NORTH - CLEVE HILL 2.        |
| Policy CF1 – Strategic Site Allocations (Site 2- Land at Sturry/ Broad Oak) | PC ROUTE: 400kV Overhead Transmission Line route: PC ROUTE 1.                                                                            |

A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

## NGET Electricity Network Infrastructure

The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets.

Despite this NGET is not a statutory consultee in the plan-making process but it is recommended that NGET are consulted at the earliest possible opportunity in order that advice and guidance can be taken into account on development near overhead lines, or wider policies that may affect the existing or future supply of electricity.

With the above context in mind, the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured.

## Interactions Commentary

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

## Policy DS22 – Habitats, landscapes and sites of local importance (Great Stour, Ashford to Fordwich Local Wildlife Site)

Policy DS22 protects a Local Wildlife Site designation which includes within it NGET freehold land, as detailed above. NGET owns and manages a large estate of land surrounding its substations across its sites in England and Wales. Freehold land, often held as "operational" for future operational use, is critical

to allow for future expansion of NGET infrastructure already within the existing site, and this is particularly important given the context of NGET's responsibilities relating to the Great Grid Upgrade and UK's transition toward net zero, and the crucial role NGET's infrastructure will play in achieving this. It is particularly important to note also that such expansion cannot occur anywhere else except for in relation to NGET's existing assets, in this case the substations within the freehold land. Their future expansion relies on the wider freehold land being available for this. The land also plays an important safety and security role surrounding the existing substations, providing the required clearances.

It is assumed that this Local Wildlife Site designation has been and remains evidence-informed and it is understood that, ultimately, the Local Planning Authority – in this case Canterbury City Council – are not responsible for the identification of Local Wildlife Sites within Canterbury District – that responsibility falls to the Kent Wildlife Trust. However it is the policies within the Local Plan which protect such assets and determine what can or cannot take place within them from a development perspective.

Clearly, there are significant portions of the Local Wildlife Site which falls within NGET's freehold that would not be suitable for accommodating future expansion of NGET assets. In particular, land around Vauxhall Lakes to the southwest of the substations which also suffers from significant flood risk. However, there are also areas tightly contained to the extent of the substations which are more likely to be able to accommodate a future need for expansion, should it arise.

Given the obvious value of parts of the Local Wildlife Site designation, NGET consider that suitable recognition within Policy DS22 of the potential future role of parts of the NGET freehold extent (to accommodate future expansion) would suffice. Point (1) of Policy DS22 states:

*"Proposals for development likely to have an adverse effect, either directly or indirectly, on Local Wildlife Sites; Local Nature Reserves; or Regionally Important Geological / Geomorphological Sites will only be permitted where the justification for the proposals clearly outweighs any harm to the intrinsic nature conservation and/or scientific value of the site".*

The expansion of assets to enable NGET to undertake its duties as set out above – including the UK's transition toward net zero, is locationally reliant i.e. NGET can only expand its assets where they are currently located. As a result, NGET's view is that future proposals for expansion within this freehold would be justified so as to outweigh harm. NGET consider that a more direct recognition of this within Policy DS22 would be beneficial, given the significant extent of NGET freehold land that is included within a related designation. To achieve this, it is proposed that the following wording be added to point (1) of Policy DS22 (*red italics*) and would ensure the policy is effective:

*"Proposals for development likely to have an adverse effect, either directly or indirectly, on Local Wildlife Sites; Local Nature Reserves; or Regionally Important Geological / Geomorphological Sites will only be permitted where the justification for the proposals clearly outweighs any harm to the intrinsic nature conservation and/or scientific value of the site. Such proposals may include the strategic expansion of National Grid Electricity Transmission infrastructure which interacts with related designations, where required and where such proposals cannot be accommodated elsewhere."*

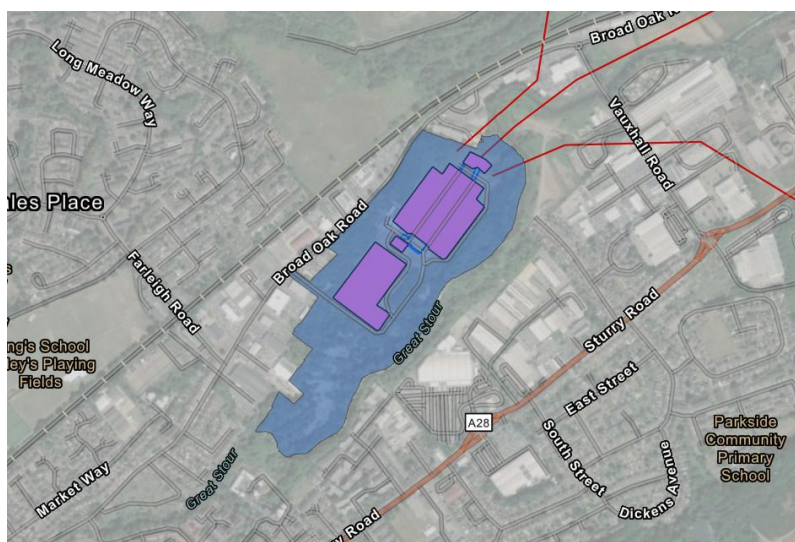


Figure 1 – NGET Freehold land shown in blue

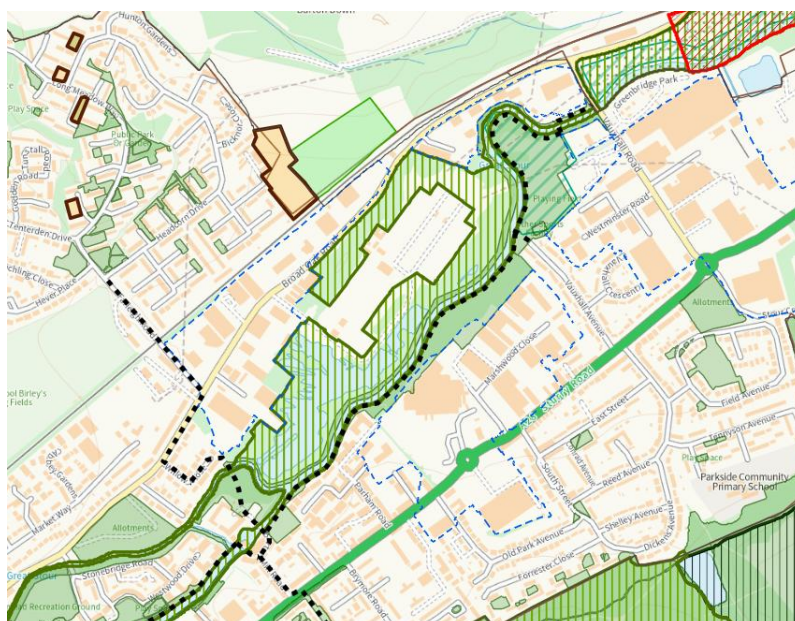


Figure 2 – Extract from proposed Policies Map showing Great Stour, Ashford to Fordwich Local Wildlife Site designation, protected under Policy DS22

**Policy C15 – Land south of Littlebourne Road; Policy C16 – Land south of Bokesbourne Lane; and Policy C31 – Land on the eastern side of Shelford Landfill**

The above proposed allocations interact with NGET assets as listed above. For the associated policies to be effective the following wording, or wording to the same effect, is required to be included within the relevant policy to ensure conflict between the assets and proposals is avoided. We propose the following wording be included within each of the related site allocation policies (C15, C16 and C31). We propose this could be under subheading 'Design and Layout' of each policy:

*"Development will include a strategy for responding to the NGET Overhead Cable Route present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."*

Without appropriate acknowledgement of the NGET assets present within each of the sites, the related policies should not be considered effective as they cannot necessarily be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure. Without the wording above or equivalent being added, we must object to Policies C15, C16 and C31 as currently drafted. It is relevant to note that a response was submitted to the Draft Canterbury District Local Plan in May 2024

on behalf of NGET by Avison Young, and this highlighted the same issues with Policy C31 – Land on the eastern side of Shelford Landfill.

### Policy CF1 – Strategic Site Allocations (Site 2 – Land at Sturry/ Broad Oak)

Whilst it is acknowledged that Site 2 of Policy CF1 is an existing allocation of the 2017 Local Plan, and the purpose of CF1 is to carry the site forward, along with 11 other strategic site allocations, it remains that the site does interact with NGET assets. Policy CF1 is required to carry Site 2 forward, and therefore presents the opportunity to appropriately recognise the presence of NGET assets within the site. We propose therefore that the wording proposed above (*red italics*) also be included within the 'Infrastructure' row under the section of the policy pertaining to Site 2.

As with the new allocations referred to above, without appropriate acknowledgement of the NGET assets present within the site, Policy CF1 should not be considered effective as it cannot not necessarily be delivered as proposed (i.e. including Site 2); unencumbered by the constraints posed by the presence of NGET infrastructure. Without the wording above or equivalent being added, we must object to Policy CF1 as currently drafted.

### New Infrastructure

Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise significantly as the way we power homes, businesses and transport evolves. As the UK transitions towards net zero, fossil fuels will be replaced by increasing volumes of low-carbon electricity, including from offshore wind and other renewable sources.

The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective.

National Grid Electricity Transmission (NGET) is delivering a range of infrastructure projects across England and Wales to support this energy transition and ensure that the transmission network can accommodate the rapid growth in low-carbon generation.

The way NGET generates electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea. Taking this context into account, In planning for the area the Council should:

- **Safeguard all existing NGET transmission assets**, including overhead lines, underground cables and substations.
- **Support future reinforcement and expansion**, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.
- **Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.**
- **Safeguard existing and potential access routes** required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations.

- Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access, unless suitable mitigation or alternative agreed routes can be secured.
- Encourage early engagement with NGET to identify and resolve any potential impacts at the earliest possible stage of the planning process.

Protecting existing assets and enabling future network development will ensure that the Council contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security.

### Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if not already included:

**Angela Brooks MRTPI, Partner**

[ngplanning@fishergerman.co.uk](mailto:ngplanning@fishergerman.co.uk)

Fisher German LLP  
The Estates Office  
Ashby de la Zouch  
LE65 2UZ

**Tiffany Bates, Development Liaison Officer**

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid Electricity Transmission  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Angela Brooks MRTPI  
Partner**

For and on behalf of Fisher German LLP

## Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/345326/download>

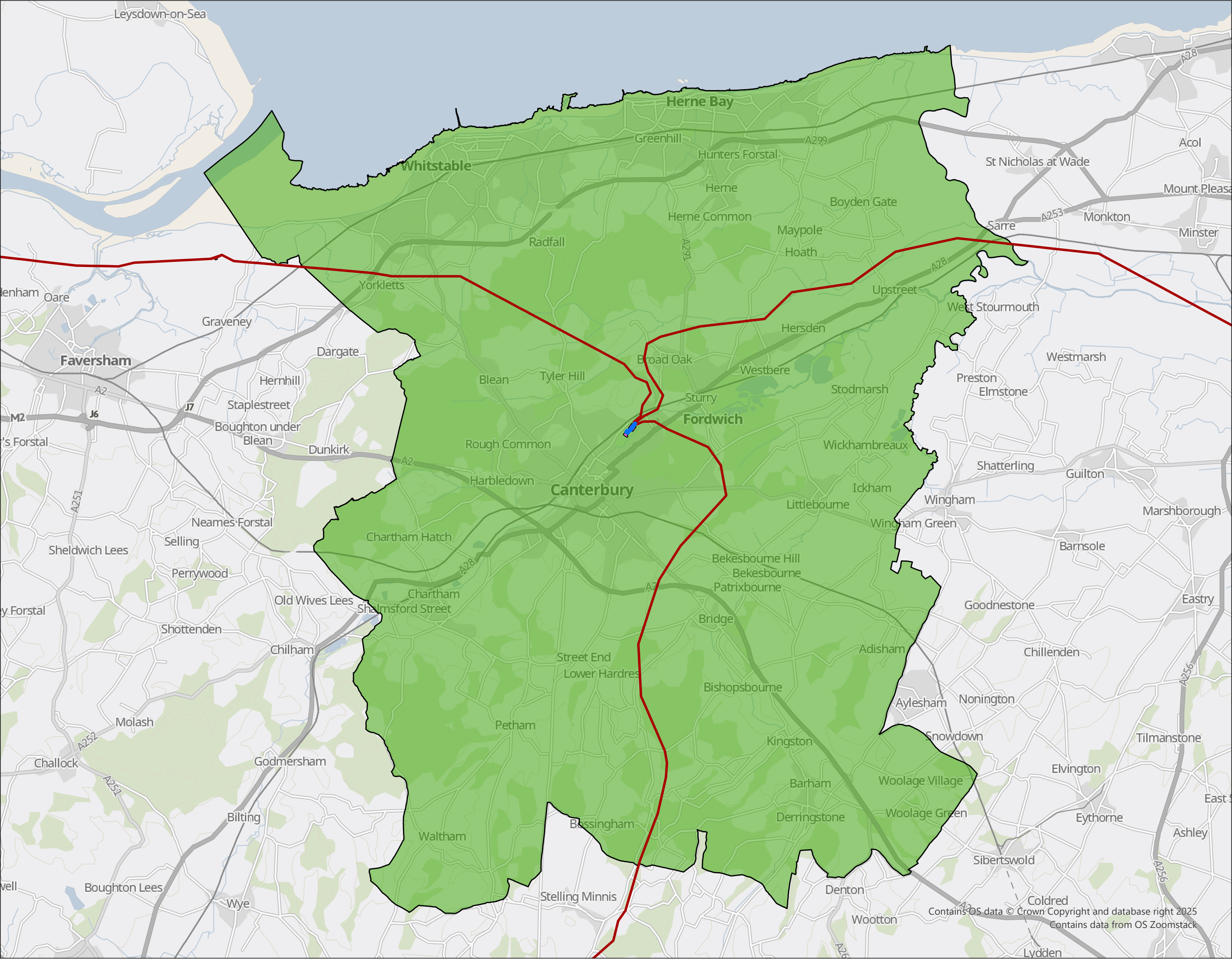
The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: <https://www.nationalgrid.com/document/349291/download>

## How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [ngplanning@fishergerman.co.uk](mailto:ngplanning@fishergerman.co.uk)



00.751.53  
Kilometers

OVERVIEW WINDOW

LEGEND:

Cable

OHL

Substation

LPA Area

REVISION: A

CLIENT: **nationalgrid**

SCHEME:  
PLANNING INTERACTION

TITLE:  
LPA ASSET INTERACTION

FP: 105181-024

SCALE: 1:92,000 @ A3

DATE: 20/05/2025

Licensed Mapping

THIS DRAWING IS PROTECTED BY COPYRIGHT. IT MAY NOT BE REPRODUCED IN ANY FORM OR BY ANY MEANS FOR ANY PURPOSE WITHOUT WRITTEN PERMISSION OF FISHER GERMAN LLP CHARTERED SURVEYORS.  
Information produced by HM Land Registry. Crown copyright and database rights 2025

**fisher  
german**

The Estates Office, Norman Court  
Ashby de la Zouch,  
Leicestershire, LE65 2UZ  
01530 412821  
fishergerman.co.uk

DRAWING REF:  
NG-2025-03-MT-OP-LPA- Canterbury

Contains OS data © Crown Copyright and database right 2025  
Contains data from OS Zoomstack